

objections to the Sentencing Guidelines, which may be different from or augment, Mr. Casada's Guidelines arguments.

While joint Sentencing Guidelines hearings for co-defendants may be unusual, they are not unprecedented. The Middle District of Tennessee previously held a joint Sentencing Guidelines hearing on the issue of "loss" in a case involving seven defendants. *United States v. Hughes*, 97 F.3d 1453 (6th Cir. 1996) (attached hereto as **Exhibit A**). The Guidelines issue decided at the joint hearing was the one common to all defendants—the value of the stolen tires at issue in the case. *Id.*

Undersigned counsel has conferred with Assistant United States Attorney Taylor Phillips, who states that the government does not oppose a joint Sentencing Guidelines hearing in accordance with the schedule proposed above. Undersigned counsel has also conferred with counsel for Mr. Casada, who states Mr. Casada's preference is to keep the sentencing hearings separate.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing motion was electronically filed with the Clerk on August 29, 2025, and service was made upon the following via CM/ECF and/or by email.

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